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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

ALMA RAVEN-GUIDO

Defendant.

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Criminal Case No: 3:21-cr-00151-HZ-1

**DECLARATION OF COUNSEL IN SUPPORT  
OF FOURTH UNOPPOSED MOTION TO  
CONTINUE TRIAL DATE**

Lauren Regan, as counsel for defendant Alma Raven-Guido, does swear under penalty of perjury that the following is true:

1. On May 17, 2021, my office filed a notice of appearance in Alma Raven-Guido's case.
2. Alma Raven-Guido is charged with one count of arson, in violation of 18 USC 844(i).
3. The allegation arises from an April 13, 2021 fire at the Portland Police Association office building in Portland, Oregon.
4. Based on identical factual allegations, Alma Raven-Guido was first indicted with various charges, including Arson, in Multnomah County Circuit Court (Case Number 21-CR-17849).

5. Alma Raven-Guido's state trial is now set for trial call on January 6, 2023. State trial may last up to two-weeks and will either commence with jury selection on January 6, 2023, or January 9, 2023, depending on State Court Judge availability and internal court calendaring.
6. Pursuant to Oregon Uniform Trial Court Rule 4.010, pre-trial substantive motions must be filed 21 days before trial, no later than December 18, 2022. However, it is Multnomah County Circuit Court's informal practice to hear and rule on all-pre-trial motions on the first day of trial, but prior to the selection of the jury.
7. The outcome of the trial and any pre-trial motions in State Court may impact the duplicative federal prosecution.
8. Further, because Alma Raven-Guido is being simultaneously charged for the same allegations in State and Federal Court, the parties are currently participating in mediation in an attempt to globally resolve both the State and Federal cases.
9. The parties have continued to confer and have made substantial headway in their negotiations. Each party is hopeful that an agreed resolution can be reached, obviating the need for a trial in either jurisdiction.
10. Given the above circumstances, counsel needs additional for the mediation process, as well as time to prepare for trial in both the Federal and State courts, should mediation fail.
11. Alma Raven-Guido requests this court strike their current trial date of December 13, 2022, and set their case for a status conference for a date the week of January 9, 2023.
12. This motion is not made for an improper purpose, nor to cause needless delay or abuse of process.
13. The Government, by and through counsel Katherine Rykken and Bryan Chinwuba, join in this request, and do not oppose this continuance.

Respectfully submitted this 1st day of November, 2022.

/s/ Lauren C. Regan

Lauren Regan

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2022, I electronically filed the foregoing  
**LAUREN REGAN'S DECLARATION IN SUPPORT OF DEFENDANT'S FOURTH  
UNOPPOSED MOTION TO CONTINUE TRIAL DATE** with the Clerk of the Court using the  
CM/ECF system which will send notification of such filing to the parties on record.

/s/ Lauren C. Regan

Lauren Regan

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